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Attorney for Mr. Velasco-Acevedo,

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA,)	CASE NO. 08CR1190-JM
)	
Plaintiff,)	DATE: JUNE 28, 2008
)	TIME: 11:00 A.M.
v.)	
)	NOTICE OF MOTIONS AND MOTIONS TO:
JOSE LUIS VELASCO-ACEVEDO,)	
)	(1) DISMISS FOR GRAND JURY
Defendant.)	VIOLATION;
)	(2) COMPEL DISCOVERY/PRESERVE
)	EVIDENCE;
)	(3) GRANT LEAVE TO FILE FURTHER
)	MOTIONS
)	
)	
)	

**TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
WILLIAM HALL, ASSISTANT UNITED STATES ATTORNEY:**

PLEASE TAKE NOTICE that on June 28, 2008 at 11:00 a.m., or as soon thereafter as counsel may be heard, defendant, Jose Luis Velasco-Acevedo, by and through his attorney, Norma A. Aguilar, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Jose Luis Velasco-Acevedo, by and through his attorney, Norma A. Aguilar and Federal Defenders of San Diego Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Dismiss for Grand Jury Violation;
- (2) Compel Discovery/Preserve Evidence;
- (3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 16, 2008

/s/ Norma A. Aguilar
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